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Attorney for Debtor,  
Deborah Geller

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

In re:	)	Case No.: No. 09-48358 RN 13
	)	
Deborah Geller,	)	Motion Docket # SEO-001
	)	
Debtor.	)	Chapter 13
	)	Hearing Date: NO HEARING SET
	)	Hearing Time:
	)	Hearing Place:
	)	Honorable Judge Randall J. Newsome
	)	
	)	
	)	

**APPLICATION FOR ORDER BY DEFAULT ON MOTION TO AVOID LIEN RELATED  
TO CLAIM OF BANK OF AMERICA NA**

Debtor DEBORAH GELLER hereby requests entry of an order avoiding the lien related to the claim of BANK OF AMERICA NA and represents as follows:

1. On October 7, 2009 debtors filed their Motion To Avoid Lien Related to Claim Of Bank of America N A (the "Motion") and supporting documents.
2. Debtors noticed their Motion by way of Court's "scream or die" procedures, providing notice and opportunity for a hearing pursuant to Bankruptcy Local Rule 9014-1.
3. Debtors served the Motion, notice and related documents in support thereof by U.S. Mail on October 5, 2009.
4. More than twenty (20) days have elapsed since such services and debtors, nor their attorney, have been served with no response or request for hearing.

APPLICATION FOR ENTRY OF ORDER ON MOTION TO AVOID LIEN RELATED

1 I declare under penalty of perjury under the laws of the United States that the foregoing is  
2 true and correct and that this declaration was executed on February 3, 2010 at Pleasanton,  
3 California.

4  
5 /s/ Shannon E. Oltarzewski  
6 SHANNON E. OLTARZEWSKI (SB No. 191269)  
7 Attorney for Debtors  
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APPLICATION FOR ENTRY OF ORDER ON MOTION TO AVOID LIEN RELATED



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8 **CERTIFICATE OF SERVICE**

9 **UNITED STATES BANKRUPTCY COURT**  
10 **DISTRICT OF CALIFORNIA**  
11 **OAKLAND DIVISION**

12 The undersigned, does hereby certify the following to be true and correct.

13 On Wednesday, February 3, 2010, a copy of the following documents, described below,

- 14 • **APPLICATION FOR ORDER BY DEFAULT ON MOTION TO AVOID LIEN**  
15 **RELATED TO CLAIM OF BANK OF AMERICA NA**
- 16 • **PROPOSED ORDER GRANTING MOTION TO AVOID LIEN RELATED TO**  
17 **CLAIM OF BANK OF AMERICA NA**

18 were deposited for delivery by the United States Postal Service, via first class United States  
19 Mail, postage prepaid, first class, with sufficient postage thereon to the parties listed on the  
20 mailing list attached hereto and incorporated as though fully set forth herein.

21 I, Angel Coronel, declare under penalty of perjury that I have served the above referenced  
22 documents on the above listed entities in the manner shown, and prepared the Certificate of  
23 Service and that it is true and correct to the best of my knowledge, information, and belief.

24 DATED: February 3, 2010

25 

26 Angel Coronel  
27 LPLM Tax Attorneys, Inc.  
28 4900 Hopyard Road, Suite 200  
Pleasanton, California 92054

**CERTIFICATE OF SERVICE**



Chapter 13 Trustee  
Martha Bronitsky  
PO Box 5004  
Hayward, California 94540-5004

Officer of Corporation  
Bank of America NA  
450 American Street  
Simi Valley, California 93065-6285

Officer of Corporation  
Bank of America NA  
4060 Ogletwon/stan  
Newark, Delaware 19713

Officer of Corporation  
Bank of America NA  
4161 Piedmont Parkway  
Greensboro, North Carolina 27410-8119

Custom Recording Solutions  
On Behalf of Bank of America NA  
2550 N. Redhill Avenue  
Santa Ana, California 92705

California Reconveyance Company  
On Behalf of Bank of America NA  
9200 Oakdale Avenue  
Mailstop CA-2-4379  
Chatsworth, California 91311

Agent for Service of Process for Bank of America NA  
CT Corporation  
818 West Seventh Street  
Los Angeles, California 90017

Officer of Corporation  
Washington Mutual Fa  
7757 Bayberry Road  
Jacksonville, Florida 32256-6816

Agent for Service of Process for Washington Mutual  
Theresa M Marchlewski  
9200 Oakdale Avenue N1107101  
Chatsworth, California 91311

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2 PITE DUNCAN, LLP  
3 4375 Jutland Drive, Suite 200  
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6 Richard J. Bauer Jr.  
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